

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

LONG, D.,
individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

Case No. 3:15-cv-00081

EPIC SYSTEMS CORPORATION,

Defendant.

DECLARATION OF TOM HAWES

I, Tom Hawes, based on my personal knowledge and pursuant to 28 U.S.C. § 1746,
declare as follows:

1. I am over the age of 18, and I make this declaration based on my personal knowledge, my review of business records, and in consultation with others as noted below.
2. I have been employed by Epic Systems Corporation (“Epic” or the “Company”) since 10/12/1998. My current title is Operations Reporting.
3. My responsibilities as Operations Reporting include, among other things, retrieving data from internal databases for information gathering.
4. A true and correct copy of TLG data fields including EMP_ID, EMP_NAME, DATE_WORKED, TLP_ID, TLP_NAME, TLP_TYPE, DESCRIPTION, and HOURS for Dayna Long, Lope Lopez, Caitlyn Paley, Jennifer Phelps, Michelle Vanderwist, Steven Yenser, Lee Radke, Sarah Profumo, Eric Thayer, Jennifer Seeker Conroy, RaeAnn Rockhill, Rachel Keranen, Allison Reuschlein, Willie Lin, and Sara Kosciolek was produced in this litigation as EPICVLONGD013384.

5. The TLG data reflects that Dayna Long recorded a total of 3,051 hours. This includes 182 hours recorded as "EDUCATION (INTERNAL);" 216 hours recorded as "MANAGEMENT - GENERAL;" 0 hours recorded as "NEW STAFF ORIENTATION COORDINATION;" 5 hours recorded as "WR-DLG-BASED DOCUMENTATION;" 510 hours recorded as "WR-GENERAL WRITING DUTIES;" 50 hours recorded as "WR-OTHER STANDARD DELIVERABLES;" 643 hours recorded as "WR-PROJECT WORK;" 10 hours recorded as "WR-QUICK START GUIDES;" 558 hours recorded as "WR-WORKFLOW AND STRATEGY DOCUMENTS;" and 74 hours recorded as "WR-WRITING WORKGROUPS."

6. The TLG data reflects that Lope Lopez recorded a total of 3,031 hours. This includes 508 hours recorded as "EDUCATION (INTERNAL);" 0 hours recorded as "MANAGEMENT - GENERAL;" 45 hours recorded as "NEW STAFF ORIENTATION COORDINATION;" 0 hours recorded as "WR-DLG-BASED DOCUMENTATION;" 434 hours recorded as "WR-GENERAL WRITING DUTIES;" 198 hours recorded as "WR-OTHER STANDARD DELIVERABLES;" 4 hours recorded as "WR-PROJECT WORK;" 403 hours recorded as "WR-QUICK START GUIDES;" 0 hours recorded as "WR-WORKFLOW AND STRATEGY DOCUMENTS;" and 4 hours recorded as "WR-WRITING WORKGROUPS."

7. The TLG data reflects that Caitlyn Paley recorded a total of 1,931 hours. This includes 253 hours recorded as "EDUCATION (INTERNAL);" 0 hours recorded as "MANAGEMENT - GENERAL;" 444 hours recorded as "NEW STAFF ORIENTATION COORDINATION;" 515 hours recorded as "WR-DLG-BASED DOCUMENTATION;" 76 hours recorded as "WR-GENERAL WRITING DUTIES;" 18 hours recorded as "WR-OTHER STANDARD DELIVERABLES;" 206 hours recorded as "WR-PROJECT WORK;" 108 hours recorded as "WR-QUICK START GUIDES;" 0 hours recorded as "WR-WORKFLOW AND STRATEGY DOCUMENTS;" and 0 hours recorded as "WR-WRITING WORKGROUPS."

8. The TLG data reflects that Jennifer Phelps recorded a total of 1,927 hours. This includes 58 hours recorded as "EDUCATION (INTERNAL);" 420 hours recorded as "MANAGEMENT - GENERAL;" 0 hours recorded as "NEW STAFF ORIENTATION COORDINATION;" 0 hours recorded as "WR-DLG-BASED DOCUMENTATION;" 250 hours recorded as "WR-GENERAL WRITING DUTIES;" 266 hours recorded as "WR-OTHER STANDARD DELIVERABLES;" 76 hours recorded as "WR-PROJECT WORK;" 21 hours recorded as "WR-QUICK START GUIDES;" 114 hours recorded as "WR-WORKFLOW AND STRATEGY DOCUMENTS;" and 3 hours recorded as "WR-WRITING WORKGROUPS."

9. The TLG data reflects that Michelle Vanderwist recorded a total of 767 hours. This includes 3 hours recorded as "EDUCATION (INTERNAL);" 0 hours recorded as "MANAGEMENT - GENERAL;" 0 hours recorded as "NEW STAFF ORIENTATION COORDINATION;" 450 hours recorded as "WR-DLG-BASED DOCUMENTATION;" 74 hours recorded as "WR-GENERAL WRITING DUTIES;" 0 hours recorded as "WR-OTHER STANDARD DELIVERABLES;" 68 hours recorded as "WR-PROJECT WORK;" 0 hours recorded as "WR-QUICK START GUIDES;" 0 hours recorded as "WR-WORKFLOW AND STRATEGY DOCUMENTS;" and 0 hours recorded as "WR-WRITING WORKGROUPS."

10. The TLG data reflects that Steven Yenzer recorded a total of 2,849 hours. This includes 80 hours recorded as "EDUCATION (INTERNAL);" 0 hours recorded as "MANAGEMENT - GENERAL;" 0 hours recorded as "NEW STAFF ORIENTATION COORDINATION;" 313 hours recorded as "WR-DLG-BASED DOCUMENTATION;" 475 hours recorded as "WR-GENERAL WRITING DUTIES;" 6 hours recorded as "WR-OTHER STANDARD DELIVERABLES;" 169 hours recorded as "WR-PROJECT WORK;" 241 hours recorded as "WR-QUICK START GUIDES;" 0 hours recorded as "WR-WORKFLOW AND STRATEGY DOCUMENTS;" and 294 hours recorded as "WR-WRITING WORKGROUPS."

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 13, 2016

Tom Hawes

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